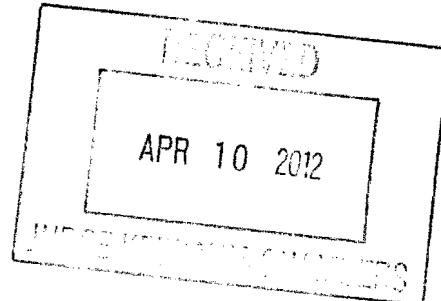


**MEMO ENDORSED****Federal Defenders  
OF NEW YORK, INC.**Southern District  
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Tel: (212) 417-8700 Fax: (212) 571-0392David E. Patton  
Executive DirectorSouthern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

April 9, 2012

VIA FACSIMILE

The Hon. John F. Keenan  
 Untied States District Court  
 Southern District of New York  
 500 Pearl Street  
 New York, NY 10007



Re: United States v. Manssor Arbabsiar  
 11 Cr. 897 (JFK)

Hon. Judge Keenan:

On March 30, 2012, the government informed us of their ex-parte submission to the Court pursuant to section 4 of the Classified Information Procedures Act. Mr. Arbabsiar objects to the government's request to file its Section 4 application ex-parte, and seeks to compel disclosure of discovery to cleared counsel.

Mr. Arbabsiar requests the opportunity to brief the issue presented by the government in its letter of March 30, 2012, and intends to submit its papers in opposition no later than Monday, April 16, 2012. Thank you.

Respectfully submitted,

*S.P.S.*  
 Sabrina P. Shroff  
 Attorney for Manssor Arbabsiar

cc: AUSAs Kopp & Kim

*Application by the defense to brief the issue is granted. Should the Government wish to reply they should do so by April 30, 2012.*

*Scheduled April 10, 2012* *John F. Keenan*  
*4-10-12* *S.A. D.J.*

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